

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

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AMERICAN ENVIRONMENTAL  
ENTERPRISES, INC., d/b/a THE  
SAFETYHOUSE.COM,

Plaintiff,

v.

MANFRED STERNBERG, ESQUIRE, and  
MANFRED STERNBERG & ASSOCIATES, PC,  
and CHARLTON HOLDINGS GROUP, LLC, and  
SHLOMO GROSS a/k/a SAMUEL GROSS, and  
GARY WEISS, and A.SOLAR, LLC, and  
DAPHNA ZEKARIA, ESQUIRE, and  
SOKOLSKI & ZEKARIA, P.C.

Defendants

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CIVIL ACTION

No. 2:22-CV-0688 (JMY)

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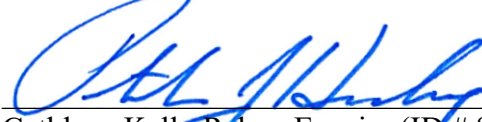
**MEMORANDUM OF LAW OF DEFENDANTS, DAPHNA ZEKARIA, ESQUIRE, AND  
SOKOLSKI & ZEKARIA, P.C., IN SUPPORT OF THEIR RESPONSE TO PLAINTIFF'S  
MOTION TO COMPEL AND FOR SANCTIONS**

Plaintiff served its discovery requests upon the Answering Defendants on October 4, 2023, prior to undersigned counsel's entry into the case. Undersigned counsel not aware of any Rule 26(f) conference taking place between Plaintiff and Answering Defendants.

Answering Defendants provided Plaintiff with partial responses to its request for Production of Documents on March 4, 2024. *See Exhibit "A"*. Answering Defendant will produce additional documents later today and will produce full responses to all outstanding discovery requests within the next five (5) days.

For all of the above-stated reasons, Defendants, Daphna Zekaria, Esquire, and Sokolski & Zekaria, P.C., respectfully request that this Honorable Court deny Plaintiff's Motion and issue an appropriate Order forthwith.

**REBAR KELLY**



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Attorneys for Defendants, Daphna Zekaria,  
Esquire and Sokolski & Zekaria, P.C.

**DATE: March 28, 2024**